

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

Ana R. Olivella Rivera

Plaintiff

vs.

**Popular Leasing and Rental, Inc
and others**

Defendants

District Court No.

3:98 cv-2267 JAG-GAG

MOTION REQUESTING ADDITIONAL TIME TO REPLY TO PLAINTIFF'S
OPPOSITION TO MOTION FOR SUMMARY JUDGEMENT

TO THE HONORABLE COURT:

Comes now defendants **Popular Auto, Inc** (formerly Popular Leasing & Rental, Inc.) and respectfully shows and prays:

1. Plaintiff recently filed a much belated opposition to the pending Motion For Summary Judgment. This past days we were working on a Reply to Plaintiff opposition.
2. On April 4, 2006 Plaintiff notified additional exhibits to his opposition. As far as we have been able to verify, some of these exhibits were never produced to us during discovery, and we are certain that we had requested all documents in the possession of plaintiff.
3. We are not really concerned that these exhibits will change the outcome of the the motion for summary judgment, but we have to verify these new documents with the client.
4. Next week the undersigned attorney will be on a short vacation and will return on April 18. We respectfully request that an extension of time to file

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an opposition or response to plaintiff motion to be due on or before April 22, 2006.

WHEREFORE, Defendants requests an additional term up to April 22, 2006 to file a response to plaintiff Opposition To Summary Judgment.

I HEREBY CERTIFY: that on this same date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: **Rafael Oliveras López, Esq.**, and to **Ana María Otero, Esq.** Box 902393, San Juan, Puerto Rico 00902-3933.

In San Juan, Puerto Rico, April 6, 2006.

Pérez Pietri & Díaz Ríos

Attorneys For Popular Leasing

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A handwritten signature in blue ink, appearing to read 'David López-Pumarejo', is positioned above the printed name and contact information.

David López-Pumarejo, Esq.

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